

THE MARKS LAW FIRM, P.C.

November 29, 2023

Filed via ECF

Hon. Edgardo Ramos
United States District Judge
United States Courthouse
40 Foley Square, Courtroom 619
New York, New York 10007
E: ChambersNYSDRamos@nysd.uscourts.gov

MEMO ENDORSED

RE: **Graciela Doncouse v. Whalebone Project, LLC, et al.**
Index: 1:22-cv-07541-ER

Dear Judge Ramos,


The parties respectfully request a seven (7) day adjournment of today's Hearing scheduled for 3:30pm on **November 29, 2023** to **December 6, 2023**, in accordance with Your Honor's November 6, 2023 Order. [Dkt. 48].

The reason for this request, is that, as of today, we received a call from Defense Counsel, David W. Graber seeking to finalize a meaningful confidential settlement in this matter and requested a one-week extension of the in-person conference scheduled today before Your Honor. Based on today's call and Mr. Graber's assurances, and progress on the resolution, Plaintiff consents to the one-week extension to **December 6, 2023** or another time in this Court's discretion to make a final attempt to resolve this matter amicably. The resolution would be a global resolution that involves all parties, including Whalebone through its officer "Eddie Berrang."

We believe a one-week final adjournment should be sufficient time as a final attempt to amicably conclude this matter and if the parties are unable to finalize settlement, then proceed forward with the hearing as originally scheduled without further extension or delay. This is the first letter request on consent of all parties.


We thank the Court for its time and consideration on this matter.

Today's motion hearing is adjourned to
December 7, 2023 at 2:30 p.m.
SO ORDERED.


Edgardo Ramos, U.S.D.J.
Dated: 11/29/2023
New York, New York

Respectfully Submitted,

The Marks Law Firm, P.C.

By: 
Bradly G. Marks